

OBER | KALER  
A Professional Corporation

Ober, Kaler, Grimes & Shriver  
Attorneys at Law

120 East Baltimore Street  
Baltimore, MD 21202-1643  
410-685-1120 / Fax 410-547-0699  
www.ober.com

RECEIVED

JUDGE WILLIAM M. NICKERSON

May 9, 2002

Geoffrey S. Tobias  
gstobias@ober.com  
410-347-7339

Offices in  
Maryland  
Washington, D.C.  
Virginia

**VIA HAND DELIVERY**

The Honorable William M. Nickerson  
United States District Court for the District of Maryland  
3<sup>rd</sup> Floor, Room 330  
101 W. Lombard Street  
Baltimore, Maryland 21201

Re: Allied Signal Technical Services Corp. V. M/V DAGMAR MAERSK,  
etc., et al.  
Civil Action No.: WMN-00-CV-3730

Dear Judge Nickerson:

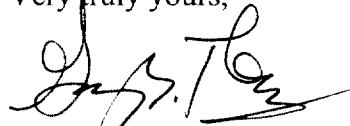
By way of a letter dated March 19, the parties requested an extension of the discovery schedule through May 8, 2002, with a status report then due.

In accordance with the informal agreement amongst the parties, discovery as to liability issues is complete, or virtually so. The parties propose that Motions for Summary Judgment be filed by each of them on or before May 21, with Memoranda in Opposition to be filed by June 7<sup>th</sup>. We believe this to be consistent with the intent of Local Rule 105.2.

Depending upon the Court's decisions, a supplemental schedule addressing discovery as to damages would be submitted. By submitting this schedule, none of the parties intends to waive the opportunity to seek additional discovery on the issue of damages.

Thank you for your consideration of this request.

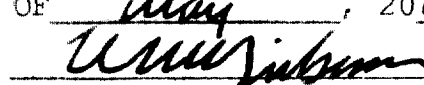
Very truly yours,

  
Geoffrey S. Tobias

GST/mac

cc: James D. Skeen, Esq. (via facsimile)  
Henry P. Gonzalez, Esq. (via facsimile)

GST 696167.1 5/9/02 9:50 AM

" APPROVED " THIS 9<sup>th</sup> DAY  
OF May, 2002  
  
UNITED STATES DISTRICT JUDGE

25